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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

RMC MOTORSPORTS, LLC

Plaintiff,

vs.

BERKSHIRE HATHAWAY DIRECT  
INSURANCE COMPANY, et al.

Defendants

Case No.: 2:25-CV-00547-CDS-DJA

STIPULATION AND ~~PROPOSED~~ ORDER  
RE: EXTENDING THE DEADLINE TO  
RESPOND TO THE MOTION TO COMPEL  
APPRAISAL AND STAY THE CASE

(First Request)

TO THE COURT:

Plaintiff RMC Motorsports, LLC (“RMC”) and Berkshire Hathaway Direct Ins. Co. and  
Biberk Insurance Services, Inc. (collectively “Berkshire”), by and through counsel, stipulate and  
agree as follows:

WHEREAS, this matter is an insurance coverage dispute regarding benefits owing in  
connection with stolen property;

WHEREAS, on March 31, 2025, Berkshire filed a Motion to Compel Appraisal and Stay  
the Case (ECF NO. 6);

WHEREAS, RMC and Berkshire (collectively “Parties”) desire to explore settlement in  
lieu of incurring litigation costs and expenses;



1 WHEREFORE, the Parties, subject to this Court's approval, agree to extend the deadline  
2 for RMC to respond to Berkshire's Motion to Compel Appraisal and Stay the Case (ECF NO. 6)  
3 to April 28, 2025.

4 IT IS SO AGREED.

5 DATED: April 14, 2025

DATED: April 14, 2025

6 LEVERTY & ASSOCIATES LAW CHTD.

MORALES FIERRO & REEVES

7  
8 /S/ Patrick Leverty  
Patrick R. Leverty, Esq.  
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10 *Attorneys for RMC Motorsports, LLC*

/S/ William Reeves  
William C. Reeves, Esq.  
600 S. Tonopah Drive, Suite 300  
Las Vegas, NV 89106  
11 *Attorneys for Defendants*  
12 *Berkshire Hathaway Direct Ins. Co. and*  
13 *Biberk Insurance Services, Inc.*

14 The Court, having considered the stipulation of the Parties and good cause appearing,  
15 extends the deadline for RMC to respond to Berkshire's Motion to Compel Appraisal and Stay  
the Case (ECF NO. 6) to April 28, 2025.

16 IT IS SO ORDERED.

17   
18 DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

19 DATED: 4/15/2025  
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**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify under penalty of perjury that I am an employee of Leverty & Associates Law, Chtd., and that service of the foregoing STIPULATION AND [PROPOSED] ORDER RE: EXTENDING THE DEADLINE TO RESPOND TO THE MOTION TO COMPEL APPRAISAL AND STAY THE CASE was made CM/ECF to all parties on the Service List including:

William C. Reeves State Bar No.: 8235 MORALES FIERRO & REEVES 600 S. Tonopah Drive, Suite 300 Las Vegas, NV 89106 Telephone: 702/699-7822 Facsimile: 702/699-9455 Email: wreeves@mfrlegal.com <i>Attorneys for Defendants</i> <i>Berkshire Hathaway Direct Ins. Co. and</i> <i>Biberk Insurance Services, Inc.</i>	
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DATED: April 14, 2025

  
An Employee of Leverty & Associates Law Chtd.

